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SHANE SCOTT, RON FRANCO, and PHARMA PAK, INC.

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

BRUCE CAHILL, an individual, et al., )

Plaintiffs, )

-- vs. -- )

PAUL PEJMAN EDALAT, an  
individual, et al., )

Defendants. )

AND RELATED CROSS-  
CLAIMS/COUNTERCLAIMS. )

**CASE NO: 8:16-cv-00686-AG-DFM**

**STATEMENT OF PLAINTIFFS AS  
TO THE SPECIFIC ORDER THEY  
SEEK ON THEIR MOTION TO  
COMPEL PRODUCTION OF  
CERTAIN DOCUMENTS FROM  
DEFENDANTS**

**Discovery Cut-Off: 3/24/2017  
Pretrial Conference: 5/22/2017  
Jury Trial 6/13/2017**

**Date: March 21, 2017  
Time: 10:00 a.m.  
Place: Courtroom 6B  
Honorable Douglas F. McCormick**

**United States Courthouse  
411 West Fourth Street  
Santa Ana, CA 92701-4516**

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At the hearing held on March 13, 2017, on the setting of a hearing date on Plaintiffs' Motion to Compel Defendants to Produce Documents (Dkt. No. 193), this Court directed Plaintiffs to specify which specific relief they sought on the motion choosing from the various compromise offers they had previously made. Plaintiffs hereby request this Court to specifically enter the compromise position stated in Exhibit D (Dkt. No. 193-7) to the above-referenced motion, namely, as follows:

All emails between 6/01/15 through 2/15/16 authored or received by Olivia Karpinski and sent or received from the email address "Olivia@sentarpharma.com";

All emails between 1/01/15 through 2/15/16 authored or received by Farah Barghi and sent or received from the email address "Farah@sentarpharma.com" which contain any reference to, or attachments that relate to, the 2014 Scilabs Pharmaceuticals PPM, or the 2015 Sentar Pharmaceuticals PPM or the product Citirex;

All emails between 1/01/15 through 2/15/16 authored or received by Paul Edalat and sent or received from the email address "Paul@sentarpharma.com" which relate to or contain any reference to, or attachments that relate to, the 2014 Scilabs Pharmaceuticals PPM, or the 2015 Sentar Pharmaceuticals PPM, or the product Citirex.

For the reasons stated in Plaintiffs' moving papers, Plaintiffs respectfully submit that an order directing production of the above-described documents is reasonable.

Dated: March 17, 2017

Respectfully submitted,

MARKHAM & READ

/s/ John J.E. Markham, II

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7 *Counsel on behalf of Plaintiffs Bruce*  
8 *Cahill, Greg Cullen, Ron Franco, and*  
9 *Pharma Pak and Counterclaim*  
10 *Defendants*

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**CERTIFICATE OF SERVICE**

Commonwealth of Massachusetts ) ss,  
County of Suffolk. )

I am employed in the county and state aforesaid. I am over the age of 18 and not a party to the within action. My business address is One Commercial Wharf West, Boston MA 02110

On March 17, 2017, I served the foregoing document described as:

**STATEMENT OF PLAINTIFFS**

**[X] BY ELECTRONIC MAIL via the ECF filing system on:**

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*Attorneys for Defendants Paul Pejman Edalat, Olivia Karpinski, Farah Barghi, Blue Torch Ventures, Inc., LIWA, N.A., Inc., Sentar Pharmaceuticals, Inc. and EFT Global Holdings, Inc.*

Executed on March 17, 2017, in Boston, Massachusetts.

I declare under penalty of perjury under the laws of United States and the State of California that the foregoing is true and correct.

/s/ John J. E. Markham, II  
John J. E. Markham, II

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